

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
---	------------------------------------

This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03 Civ. 6978
Pacific Employers Insurance, et al. v. Kingdom of Saudi Arabia, et al., Case No. 04 Civ. 7216
Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al., Case No. 03 Civ. 8591
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03 Civ. 9849
Euro Brokers Inc., et al., v. Al Baraka, et al., Case No. 04 Civ. 7279
Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al., Case No. 04 Civ. 1922
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04 Civ. 5970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private., Ltd., et al., Case No. 04 Civ. 7065

**PLAINTIFFS' MOTION TO FILE A CONSOLIDATED AMENDED PLEADING OF
FACTS AND EVIDENCE AS TO THE KINGDOM OF SAUDI ARABIA AND THE
SAUDI HIGH COMMISSION FOR RELIEF OF BOSNIA & HERZEGOVINA**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and exhibits thereto, the Plaintiffs, by and through their counsel, will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting Plaintiffs' Motion to file a Consolidated Amended Pleading of Facts and Evidence as to the Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia & Herzegovina.

A proposed form of Order is attached.

Dated: September 15, 2014

Respectfully submitted,

/s/ Stephen A. Cozen
Stephen A. Cozen, Esq.
Elliott R. Feldman, Esq.

Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19103
(215) 665-2000

Attorneys for *Federal Insurance* Plaintiffs

Jodi W. Flowers, Esq.
Robert T. Haefeke, Esq.
MOTLEY RICE LLC
28 Bridgeside Boulevard
P. O. Box 1792
Mount Pleasant, SC 29465
(843) 216-9000

and-

Andrea Bierstein, Esq.
HANLY CONROY BIERSTEIN SHERIDAN
FISHER & HAYES, LLP
112 Madison Avenue
7th Floor
New York, NY 10016
(212) 784-6400

Attorneys for *Burnett* Plaintiffs and *Euro Brokers*
Plaintiffs

James P. Kreindler, Esq.
Justin T. Green, Esq.
Andrew J. Maloney III, Esq.
KREINDLER & KREINDLER LLP
750 Third Avenue
32nd Floor
New York, NY 10017
(212) 687-8181

Attorneys for *Ashton* Plaintiffs

Jerry S. Goldman, Esq.
ANDERSON KILL, P.C.
1251 Avenue of the Americas
New York, NY 10020
(212) 278-1000

Attorneys for *O'Neill* Plaintiffs

Chris Leonardo, Esq.
ADAMS HOLCOMB LLP
1875 Eye Street, NW
Suite 810
Washington, DC 20006
(202) 580-8803

Attorneys for *Cantor Fitzgerald*
Plaintiffs

Robert M. Kaplan, Esq.
FERBER CHAN ESSNER &
COLLER, LLP
530 Fifth Avenue, 23rd Floor
New York, NY 10036-5101
(212) 944-2200

Attorneys for *Continental Casualty*
Plaintiffs